

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WAYNE MILLER, for himself and on behalf of all :
others similarly situated, :
:

Plaintiff, :
:

-vs.- :
:

WELLS FARGO BANK, N.A., WELLS FARGO :
INSURANCE, INC., ASSURANT, INC. and :
AMERICAN SECURITY INSURANCE COMPANY, :
:

Defendants. :
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Docket No. 13-cv-1541 (VB)

DECLARATION OF LISA J. FRIED IN SUPPORT OF
DEFENDANTS WELLS FARGO BANK, N.A. AND
WELLS FARGO INSURANCE, INC.'S MOTION TO DISMISS

I, Lisa J. Fried, declare as follows:

1. I am a member of the bar of this Court and a partner of the firm Hogan Lovells US LLP, counsel for Defendants Wells Fargo Bank, N.A. ("Wells Fargo") and Wells Fargo Insurance, Inc. (with Wells Fargo, the "Wells Fargo Defendants"). I am fully familiar with the facts set forth herein. I submit this declaration in support of the Wells Fargo Defendants' motion to dismiss Plaintiff Wayne Miller's "Corrected Class Action Complaint," dated April 3, 2013 (the "Complaint").

2. Annexed hereto as **Exhibit 1** is a true and correct copy of the Complaint.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct. Executed in New York, New York on May 1, 2013.

/s/ Lisa J. Fried

Lisa J. Fried